

UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF MICHIGAN

GREG HUDSON and  
RENEE HUDSON,  
Plaintiffs,

-vs.-

Case No. 2:11-cv-15484  
Hon. Bernard Friedman

DYNAMIC RECOVERY SERVICES, LLC,  
a Michigan limited liability company, and  
JOHN DOE, a/k/a AGENT BRYANT,  
jointly and severally,  
Defendants.

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**PROPOSED JOINT DISCOVERY PLAN**

This Proposed Joint Discovery Plan was prepared in anticipation of the Court's scheduling conference, which is to be held on February 17, 2012, at 9:30 a.m.

1. **DATE OF MEETING:** A Rule 26(f) conference was held by telephone on February 1, 2012. The following persons participated:
  - a. Gary D. Nitzkin, representing Plaintiff.
  - b. Paul Beardslee, representing Defendants Dynamic Recovery Services and John Doe a/k/a Agent Bryant.
2. **INITIAL DISCLOSURES:** The parties will complete the initial disclosures required under Rule 26(a)(1) by February 29, 2012.
3. **DISCOVERY PLAN:** The parties propose the following:
  - a. Discovery will be needed on all allegations, claims, theories of liability, damages and affirmative defenses alleged in the Complaint and Answers. Discovery will be conducted by, but not limited to, depositions, interrogatories, requests for admission and requests for production.

- b. Maximum Number Of Interrogatories And Time To Respond: The parties defer to Federal Rule of Civil Procedure 33(a).
- c. Maximum Number Of Requests For Admission And Time To Respond: The parties defer to Federal Rule of Civil Procedure 36(a)(3) regarding time to respond.
- d. Maximum Number Of Requests For Production Of Documents And Time To Respond: The parties defer to Federal Rule of Civil Procedure 34(b)(2) regarding time to respond.
- e. Maximum Number Of Depositions By Each Party: The parties defer to Federal Rules of Civil Procedure 30 and 31

4. **CASE MANGEMENT AND DEADLINES:** The parties propose the following:

- a. Discovery Completion Date: June 29, 2012.
- b. Deadline For Plaintiff To Amend Pleadings Or Join Parties: February 29, 2012.
- c. Deadline For Defendants To Amend Pleadings Or Join Parties: March 15, 2012.
- d. Deadline For Plaintiff's Disclosure Of Expert Witnesses: April 1, 2012.
- e. Deadline For Defendants' Disclosure Of Expert Witnesses: April 15, 2012.
- f. Dispositive Motions Deadline: July 27, 2012.

5. **TRIAL MANAGEMENT AND DEADLINES:** The parties defer to the court's availability and scheduling preferences.

6. **ALTERNATIVE DISPUTE RESOLUTION:** The parties discussed alternative dispute resolution, but have not yet reached an agreement.

Respectfully submitted,

/s/ Gary Nitzkin

**GARY NITZKIN**

Attorney for Plaintiffs

/s/ Paul Beardslee

**PAUL BEARDSLEE**

Attorney for Defendants

Dated: February 13, 2012